

REMARKS

This paper is responsive to the Final Office Action of October 17, 2008. Applicants respectfully traverse all rejections of the Examiner. Reconsideration and further examination is respectfully requested.

Applicants wish to thank Examiner Winter for his helpfulness in telephone conversations with the undersigned Attorney on March 12 and 16, 2009. Examiner Winter indicated that subject to further consideration and search, the present amendments appear to overcome the currently cited references.

Claims 3-5, 9, 13-16 and 19 stand rejected for obviousness under 35 U.S.C. 103 based on the combination of U.S. patent 6,792,145 ("Gay"), U.S. patent 5,903,646 ("Rackman") and U.S. patent application publication 2004/0205535 ("Newman et al."). Applicants respectfully traverse these rejections.

Gay discloses extracting textual as well as tabular data material from a financial document, and a comparison made to determine the type of data schedule material provided in the document. Subsequently, Gay compares the character strings of the financial document to character strings provided in previous documents or in various databases. The database of the previous document in Gay includes the textual material in a first plane, and the tabular material also in that first plane. If a character string match is made between a new document and an old document, Gay teaches that the new tabular data material would be provided in a data matrix in a second plane but the corresponding textual material would not be included in the textual matrix provided in that second plane.

Rackman discloses an access control system for litigation document production. Documents in Rackman are produced as stored images on an optical disk, and documents which are to be redacted or maintained confidential are stored in encrypted form. Rackman teaches that as the litigation progresses, access by the opposing counsel/party to additional documents can be effected by distributing appropriate decryption keys.

Newman et al. discloses a method for display of tree-structured information in a "treetable" that is a table-like display structure, in which each path from a root to a leaf node is represented by a single column, and cells representing the immediate successors of a node are placed immediately under that node. Variation in the amount of space given to cells within particular columns of the Newman et al. display structure is used to allow more detail to be given for selected paths and subtrees. Newman et al. further teach that extraction of subparts of a treetable into another such structure may be used for deeper exploration of trees.

Nowhere in the combination of Gay, Rackman and/or Newman et al. is there disclosed or suggested a method or system that includes:

. . . storing the shadow document in a computer usable memory, determining and visually rendering a complete tree representing the conversation thread of electronic mail messages responsive at least in part to the shadow document, ***wherein the visual rendering of the complete tree representing the conversation thread of electronic mail messages graphically represents the original document as a child of the identified parent document and as a parent of the identified child document, and wherein a graphical structure of the complete tree representing the conversation thread of electronic mail messages is preserved after deleting of the original document.***
(emphasis added)

as, for example, in the present independent claim 3. In contrast, Gay teaches a technique for ensuring that a date of a document is valid from line 26 in column 27 through line 10 in column 8, Rackman describes counting pages in a document by determining the start of a scan of a new

document in lines 15-46 in column 8, and Newman et al. teach displaying a table-like “treetable” structure (Fig. 1). Neither Gay, Rackman nor Newman et al., taken individually or in combination includes any hint or suggestion of even the desirability of visually rendering a complete tree representing the conversation thread of electronic mail messages responsive at least in part to the shadow document, *wherein the visual rendering of the complete tree representing the conversation thread of electronic mail messages graphically represents the original document as a child of the identified parent document and as a parent of the identified child document, and wherein a graphical structure of the complete tree representing the conversation thread of electronic mail messages is preserved after deleting of the original document*, as in the present independent claim 3.

Independent claim 9 also stands rejected over Gay, Rackman and Newman et al. It should be understood from the above discussion regarding independent claim 3 that the combination of Gay, Rackman and Newman et al. also does not disclose or suggest all the features of the present independent claim 9, since the combination of Gay, Rackman and Newman et al. does not disclose or suggest visually rendering a complete tree representing the conversation thread of electronic mail messages responsive at least in part to the shadow document, *wherein the visual rendering of the complete tree representing the conversation thread of electronic mail messages graphically represents the original document as a child of the identified parent document and as a parent of the identified child document, and wherein a graphical structure of the complete tree representing the conversation thread of electronic mail messages is preserved after deleting of the original document*.

Independent claim 19 also stands rejected over Gay, Rackman and Newman et al. It should be understood from the above discussion regarding independent claim 3 that the

combination of Gay, Rackman and Newman et al. also does not disclose or suggest all the features of the present independent claim 19, since the combination of Gay, Rackman and Newman et al. does not disclose or suggest visually rendering a complete tree representing the conversation thread of electronic mail messages responsive at least in part to the shadow document, *wherein the visual rendering of the complete tree representing the conversation thread of electronic mail messages graphically represents the original document as a child of the identified parent document and as a parent of the identified child document, and wherein a graphical structure of the complete tree representing the conversation thread of electronic mail messages is preserved after deleting of the original document.*

For the reasons stated above, Applicants respectfully urge that the combination of Gay, Rackman and Newman et al. does not disclose all the features of independent claims 3, 9 and 19. Accordingly, Gay, Rackman and Newman et al. do not support a *prima facie* case of obviousness under 35 U.S.C. 103 with regard to independent claims 3, 9, and 19. As to claims 4-5 and 13-16 they each depend from the previously discussed independent claims, and are respectfully believed to be patentable over the combination of Gay, Rackman and Newman et al. for at least the same reasons.

Applicants have amended claims herein. However, Applicants are not conceding in this application that unamended claims are not patentable over the art cited by the Examiner, as the present claim amendments are only for facilitating expeditious prosecution of allowable subject matter. Applicants respectfully reserve the right to pursue the unamended claims in one or more continuations and/or divisional patent applications.

Applicants have made a diligent effort to place the claims in condition for allowance. However, should there remain unresolved issues that require adverse action, it is respectfully

requested that the Examiner telephone the undersigned, Applicants' Attorney at 617-630-1131 so that such issues may be resolved as expeditiously as possible.

For these reasons, and in view of the above amendments, this application is now considered to be in condition for allowance and such action is earnestly solicited.

Respectfully Submitted,

March 17, 2009
Date

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Docket No. 260-137